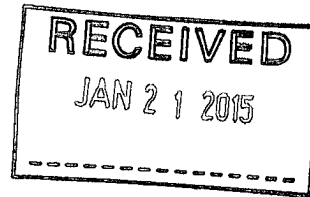


NAVAJO GENERATING STATION

P.O. Box 850
Page, AZ 86040
(928) 645-6217
Fax (928) 645-7298

ROBERT K. TALBOT
Manager



January 15, 2015

Mr. Stephen B. Etsitty, Executive Director
Navajo Nation Air Quality/Operating Permit Program
RT 112 North, Building #2427
PO Box 529
Fort Defiance, Arizona 86504

**Re: Addendum to Title V Renewal Application and CAM Plan Changes
Navajo Generating Station
Permit No. NN-ROP 05-06**

Dear Mr. Etsitty:

Enclosed is an addendum to the Renewal Application for the Salt River Project (SRP) Navajo Generating Station's (NGS) Title V air quality permit, initially submitted in January 2013. The addendum incorporates the specific provisions of the Mercury Air Toxics (MATS) Rule in 40 CFR Part 63, Subpart UUUUUU for which NGS has a compliance date of April 16, 2015.

NGS has chosen to comply with the MATS limit of 0.03 lb PM/MMBtu using continuous emissions particulate monitors (CEMS). SRP believes that compliance with the MATS limit demonstrates compliance with the higher existing Federal Implementation Plan (FIP) PM permit limit of 0.06 lb/MMBtu (Permit "Reopening" NN-ROP 05-06 Condition II.A.2.b).

In accordance with 40 CFR § 64.3(d), the use of a PM CEMS, as long as it meets the requirements of §64.3(d)(3), satisfies the requirements of Continuous Assurance Monitoring (CAM), and therefore a CAM plan is no longer needed.

If you have any questions regarding this application submittal, please contact Barbara Cenalmor at (602) 236-2322 or me at (928) 645-6217.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Talbot", followed by the letters "RKT" in a stylized, bold font.

Robert Talbot, Manager
Navajo Generating Station

cc w/attachment: Gerardo Rios, EPA Region IX
Paul Ostapuk, NGS
LOC 6-2-7.5

Gerardo C. Rios, Chief
Air Division Permits Office (AIR-3)
EPA Region IX
75 Hawthorne Street
San Francisco, CA 94105

ADDENDUM TO TITLE V RENEWAL

SALT RIVER PROJECT NAVAJO GENERATING STATION PART 71 AIR PERMIT NN-ROP 05-06

**Submitted to:
Navajo Nation Environmental Protection Agency
Operating Permit Program
RT 112 North Building #2427
Fort Defiance, Arizona 86504**

**Prepared by:
Salt River Project
P.O. Box 52025, PAB 352
Phoenix, AZ 85072-2025**



January 2015

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B	CTAC Form

Executive Summary

The Navajo Generating Station (NGS) is a pulverized coal steam electric generating facility that is operated by the Salt River Project Agricultural Improvement and Power District (SRP). The facility is located in northeastern Arizona.

NGS is a major stationary source of air emissions operating under a Part 71 Air Permit NN-ROP 05-06 issued on July 3, 2009. This permit was valid until July 3, 2013 and SRP applied for the permit renewal on January 3, 2013.

The station consists of three generating units, designated as Units 1, 2 and 3, which produce a combined electrical output of 2,250 net megawatts. The facility also includes two auxiliary boilers rated at 308 million British thermal units per hour (MMBtu/hr).

All three generating units at NGS are subject to the federal Mercury and air Toxics Standard (MATS) contained in Title 40 of the Code of Federal Regulations (CFR) Part 63 Subpart UUUUU. The MATS rule has a compliance date of April 16, 2015 (compliance date) however SRP has been granted a one year extension for the mercury provisions of the rule. SRP is submitting this addendum to the Title V renewal application submitted in January of 2013 to incorporate the non-mercury applicable MATS requirements.

1.0 PM and SO₂ Provisions of the MATS Rule

NGS consists of three coal-fired electric generating units (EGUs). These units are subject to EPA's Mercury and Air Toxics Standard ("MATS") finalized on February 16, 2012 and codified in 40 CFR 63 Subpart UUUUU – National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units. SRP is submitting this addendum to incorporate into part 71 air permit NN-ROP 05-06, all non-mercury requirements of the MATS rule that are applicable to NGS.

The MATS rule requires that a facility affected by the rule meet strict emission standards for mercury (Hg), filterable particulate matter (PM), individual non-Hg metal Hazardous Air Pollutants (HAPs), total non-Hg metal HAPs, and hydrochloric acid gas (HCl) by April 16, 2015 (compliance date). The Navajo Nation Environmental Protection Agency (NNEPA) and the Environmental Protection Agency (EPA) granted SRP a one-year extension (until April 16, 2016) to comply with the provisions of the rule pertaining to mercury. This extension letter is included in Appendix B.

Demonstration of initial compliance with the MATS emission standards through a performance evaluation is required no later than 180 days after the compliance date, and a Notification of Compliance Status is required to be submitted 60 days after the initial compliance demonstration. Along with the initial compliance demonstration, facilities employing neural network combustion controls are required to perform an initial performance tune-up no later April 16, 2015. Thereafter, a tune-up must be conducted for each steam boiler every 48 calendar months. Additionally, there are also monitoring, recordkeeping and reporting requirements in the MATS rule. A list of the MATS requirements applicable to each EGU at NGS are presented in Section 3 of this addendum.

2.0 Regulatory Applicability Analysis

Units 1, 2 and 3 at NGS are coal fired EGUs subject to the MATS rule. SRP requests with this addendum that all applicable MATS requirements not pertaining to mercury, including emissions limits, controls, monitoring, recordkeeping, and reporting requirements, be incorporated into Part 71 air permit NN-ROP 05-06.

Citations for the MATS provisions not pertaining to mercury and applicable to Units 1 and 2 are summarized in the table below:

Citation	Description	Compliance Methodology
When do I have to comply with this subpart?		
40 CFR 63.9984(b)		NGS will comply with Subpart UUUUU no later than April 16, 2015. (Excludes mercury provisions based on extension granted by NNEPA/EPA).
40 CFR 63.9984(f)		NGS will demonstrate that compliance has been achieved with the provisions of Subpart UUUUU by conducting tests and performance evaluations no later than 180 days after April 16, 2015.
What emission limitations, work practice standards, and operating limits must I meet?		
40 CFR 63.9991(a), (c)		Units 1, 2 and 3 at NGS are classified as existing coal-fired EGUs and will meet the limits of Tables 2 through 4 of UUUUU.
Table 2 of UUUUU	<u>Emission Limits for Existing EGUs:</u> <ul style="list-style-type: none"> Filterable PM: $3.0e^{-2}$ lb/MMBtu or $3.0e^{-1}$ lb/MWh, Or Total non-Hg metals: $5.0e^{-5}$ lb/MMBtu or $5.0e^{-1}$ lb/GWh, Or Individual HAP metals: (several). HCl: $2.0e^{-3}$ lb/MMBtu or $2.0e^{-2}$ lb/MWh, Or SO₂: $2.0e^{-1}$ lb/MMBtu or $1.5e^0$ lb/MWh. 	NGS is choosing to demonstrate compliance with the filterable PM limits and the SO ₂ limits.
Table 3 of UUUUU	Work Practice Standards: <ul style="list-style-type: none"> Tune-ups of the EGU burner and combustion controls at least every 36 calendar months, or 48 months if 	<ul style="list-style-type: none"> NGS employs neural network combustion controls and will therefore conduct boiler tune-ups every 48 months.

Citation	Description	Compliance Methodology
	<p>neural network combustion optimization software is employed.</p> <ul style="list-style-type: none"> • Startup: Operate all CMS during startup. Use clean fuels and engage all applicable control technologies except SCR. SCR must be started appropriately to comply with relevant standards applicable during normal operations. Comply with all applicable emission limits at all times except during startup and shutdown and provide reports concerning activities and periods of startup. • Shutdown: Operate all CMS during shutdown. During shutdown, NGS must operate all applicable control technologies while firing coal. Comply with all applicable emission limits at all times except during startup and shutdown and provide reports concerning activities and periods of shutdown. 	<ul style="list-style-type: none"> • NGS will comply with the work practices of Table 3 during startup and shutdown.
What are my general requirements for complying with this subpart?		
40 CFR 63.10000(a), (b),	<ul style="list-style-type: none"> • Limits apply at all times except during periods of startup and shutdown but during these periods, work practice standards of Table 3 apply. • At all times, operate and maintain air pollution control equipment and monitoring equipment in a manner consistent with safety and good air pollution control practices. 	NGS will operate existing controls to reduce PM and SO ₂ emissions.
40 CFR 63.10000 (c)(iv)	If not qualifying for low emitting EGU (LEE) for non-mercury HAP metals, compliance must be demonstrated through an initial performance test and must continuously monitor with a PM CEMS or quarterly testing. The PM CEMS must be certified in accordance with 40 CFR Part 60.	NGS will demonstrate compliance with the emission limits by certifying and operating PM Continuous Emissions Monitoring Systems (CEMS) at each stack.
40 CFR 63.10000 (c)(v)	If not qualifying for low emitting EGU (LEE) for HCl, and the EGU uses wet flue gas desulfurization technology, an SO ₂	NGS will demonstrate compliance with the emission limits by operating certified SO ₂ Continuous Emissions

Citation	Description	Compliance Methodology
	CEMS can be used to demonstrate compliance. The CEMS must be installed and operated in accordance with Part 75.	Monitoring Systems (CEMS) at each stack.
40 CFR 63.10000 (d)	A monitoring plan must be prepared and submitted, if requested, at least 60 days before the initial performance evaluation. However, sources using CEMS with existing monitoring plans prepared under Appendix B to part 60 or part 75 and meeting the requirements of 63.10010 do not have to submit a separate plan.	NGS will develop a and submit, as requested, a facility monitoring plan in accordance with 63.10000(d)(1)-(5).
40 CFR 63.10000 (e)	As part of the demonstration of continuous compliance, periodic tune-ups of the EGUs are required.	NGS will conduct periodic tune-ups as part of the demonstration of continuous compliance. These tune-ups will be conducted during annual unit outages.
What are my initial compliance requirements and by what date must I conduct them?		
40 CFR 63.10005(a), (a)(2),(d)(1) and (3), (e), (f), (j)	Initial compliance must be demonstrated with the limits in Table 2. Where two emission limits are specified (heat input based limit or electrical output based limit), compliance may be demonstrated with either. Compliance must be demonstrated no later than 180 days after the compliance date.	Initial compliance will be demonstrated by an initial performance test consisting of 30 boiler operating days of data collected with the CEMS; the demonstration will be completed by October 16, 2015 (180 days after the compliance date) .
40 CFR 63.10005 (a)(2)	Initial performance tests using CEMS consist of 30 boiler operating days of data collected by the initial compliance demonstration date (Oct. 16, 2015).	Initial compliance will be demonstrated by an initial performance test consisting of 30 boiler operating days of data collected with the CEMS; the demonstration will be completed by October 16, 2015 (180 days after the compliance date). The 30 boiler operating day average emission rate will be calculated using Equation 19 of Method 19 in Appendix A of Part 60.
40 CFR 63.10005(d)(1)	If using CEMS for compliance, the CEMS has to pass a performance evaluation (certification) prior to the initial compliance demonstration date.	The CEMS, certified, operated and maintained in accordance with 40 CFR Part 75 and Appendix B to 40 CFR 63 Subpart UUUUU. The 30 boiler operating day average emission rate will be calculated using Equation 19 of Method 19 in Appendix A of Part 60.
40 CFR 63.10005	A performance tune-up on the EGU is required as part of the	Tune ups will be conducted every 48 months during

Citation	Description	Compliance Methodology
(e), (f)	initial compliance demonstration. Units with neural network combustion controls have up to 48 months after the compliance date to conduct the tune-up, but it can be done prior to that date as long as records are maintained showing that the tune-up met the requirements of this standard.	annual unit outages.
40 CFR 63.10005 (j)	You must follow the work practice standards of Table 3 for startup and shutdown.	NGS will comply with the work practices of Table 3 during startup and shutdown periods
40 CFR 63.10005 (k)	You must submit a Notification of Compliance Status summarizing the results of the initial compliance demonstration.	NGS will submit a Notification of Compliance Status.
When must I conduct subsequent performance tests or tune-ups?		
40 CFR 63.10006(i)(2), (j)		EGU tune ups will be conducted every 48 months during annual unit outages. Results of all performance tests will be submitted within 60 days of completion of the tests.
What methods and other procedures must I use for the performance tests?		
40 CFR 63.10007(a)(1)	If using SO ₂ CEMS to determine compliance with a 30-boiler operating day rolling average emissions limit, all data for all non-exempt unit operating conditions must be collected.	PM and SO ₂ CEMS will be used to determine compliance. Performance tests will be done in accordance with Table 5 of Suppart UUUUU.
40 CFR 63.10007(b)	30-boiler operating day tests based on CEMS data must be conducted in accordance with the requirements of Table 5.	NGS will follow the requirements of Table 5 for the PM and SO ₂ CEMS.
40 CFR 63.10007 (e)(2), (3)	Methodologies for demonstrating compliance with either the lb/MMBtu or lb/MWh limits.	NGS will follow the procedures described in this section when demonstrating compliance with either the input-based or output-based limits.
40 CFR 63.10007 (f)	Upon request, records shall be made available to EPA to determine whether the performance tests have been done according to the requirements of 63.10007.	Records shall be made available if requested.
May I use emissions averaging to comply with this subpart?		
40 CFR 63.10009(a) through (e), (f)(1)(h)	Compliance may be demonstrated by emissions averaging if using CEMS. The weighted average emissions rate has to be calculated using data from all units including any that operate fewer than 30 days during the preceding 30 group boiler days.	NGS may chose to average emissions from Units 1, 2 and 3 to determine compliance with PM and SO ₂ limits using data collected by the CEMS. NGS will use the calculations in 63.1009(b) to determine group eligibility.

Citation	Description	Compliance Methodology
40 CFR 63.10009 (g)	The weighted average emission rate must be determined in accordance with 63.10009(f).	NGS will determine the weighted average emission rate in accordance with 63.10009(f).
40 CFR 63.10009 (j)	If using emissions averaging to determine compliance, an Emissions Averaging Plan must be developed in accordance with 63.10009(j), and submitted to the Director if requested.	If NGS elects to use emissions averaging for compliance determinations, an Emissions Averaging Plan will be prepared by the required date.
What are my monitoring, installation, operation, and maintenance requirements?		
40 CFR 63.10010(a)(1)	CEMS must be installed in the stack or at a location in the ductwork downstream of all emissions control devices, where the pollutant and diluents concentrations are representative of the emissions that exit to the atmosphere.	PM, SO ₂ , and CO ₂ CEMS and flow monitors will be used to determine compliance. All CEMS have been installed as required by Subpart UUUUU.
40 CFR 63.10010 (b),(f),(i)	Installation, certification, maintenance and operation requirements for SO ₂ , PM, O ₂ or CO ₂ CEMS, stack gas flow monitor or moisture monitoring systems.	PM, SO ₂ , and CO ₂ CEMS and stack flow monitors will be used to determine compliance, and they will be certified, operated and quality assured as required in Subpart UUUUU.
How do I demonstrate initial compliance with the emissions limits and work practice standards?		
40 CFR 63.10011(c)(2)	If using CEMS to measure SO ₂ or PM emissions for initial compliance, the first 30 boiler operating day average emission rate obtained with certified CEMS after the compliance date is the initial performance test.	NGS will demonstrate initial compliance by an initial test consisting of the first 30-boiler operating day rolling average emission rate obtained by certified CEMS after the compliance date.
40 CFR 63.10011(e)	A Notification of Compliance Status must be submitted with the results from the initial compliance demonstration.	A Notification of Compliance Status will be submitted by the due date.
40 CFR 63.10011(f),(g)	For periods of startup and shutdown, determine the fuel whose combustion produces the least uncontrolled emissions, that is available on site or nearby. Follow the startup and shutdown requirements of Table 3.	NGS will use clean fuel during periods of startup and shutdown, and will follow the requirements in Table 3.
How do I monitor and collect data to demonstrate continuous compliance?		
40 CFR 63.10020(a),(b)	Operate the monitoring systems and collect data except for periods of malfunction or out-of-control periods, and conduct required QA activities.	CEMS will be operated and data will be collected at all times as required by Subpart UUUUU.
40 CFR 63.10020(c), (d)	Data recorded during startup, shutdown, monitoring system malfunction or out-of-control periods, repairs associated with monitoring system malfunction or out-of-control periods, or	Data will be collected at all times as required by Subpart UUUUU.

Citation	Description	Compliance Methodology
	required monitoring system Q/A or control activities may not be used in calculations used to report emissions or operating levels. Except for those periods, failure to collect required data is a deviation from the monitoring requirements.	
How do I demonstrate continuous compliance with the emission limitations, operating limits, and work practice standards?		
40 CFR 63.10021(a), (b), (e), (f), (g), (h), (i)	Compliance must be demonstrated with each emission limit, operating limit, and work practice standard in Tables 2 through 4, according with the monitoring specified in Tables 6 and 7 and subsections of 63.10021.	Continuous compliance with the SO ₂ and PM limits will be demonstrated by using CEMS.
40 CFR 63.10021 (b)	Demonstrate continuous compliance by using all quality-assured hourly data recorded by the PM and SO ₂ CEMS and other required monitoring systems to calculate the arithmetic average emission rate in units of the standard on a continuous 30-boiler operating day rolling average basis, updated at the end of each new boiler operating day, using Equation 8.	Continuous compliance with the SO ₂ and PM limits will be demonstrated by using CEMS.
40 CFR 63.10021 (e), (f), (g), (h), (i)	Conduct periodic tune-ups of the EGUs, as specified in 63.10021(e), at least once every 48 months (when using neural network combustion optimization).	Continuous compliance with the SO ₂ and PM limits will be demonstrated by using CEMS and by conducting the boiler tune-ups every 48 months.
40 CFR 63.10021 (f)	Tune-up reports must be submitted, if required. Electronic reports required by Appendices A and B must be sent electronically as required by EPA. SO ₂ CEMS data shall be submitted using ECMPS Client Tool. PM CEMS data and CEMS performance test detail reports must be submitted through EPA's Electronic Reporting Tool, the Compliance and Emissions Data Reporting Interface, or alternate electronic file format as provided in 63.10031.	Reports will be submitted as required by Subpart UUUUU.
40 CFR 63.10021 (g)	Report each instance in which the emissions limits or operating limits were not met, or owner/operator failed to conduct a tune-up.	Deviation reports will be submitted as required.
40 CFR 63.10021(h), (i)	Keep records during startup and shutdown, and provide reports of such periods as required in 63.10031.	Startup and shutdown recording and reporting requirements will be met.
How do I demonstrate continuous compliance under the emissions averaging provision?		

Citation	Description	Compliance Methodology
40 CFR 63.10022(a)(1), (b)	For each calendar month, demonstrate compliance with the average weighted emissions limit as determined in 63.10009(f) and (g). Instances of non-compliance with the continuous monitoring requirements are deviations.	Compliance with the average weighted emissions limit will be demonstrated for each calendar month. Failing to comply with the continuous monitoring requirements will be a deviation.
What notifications must I submit and when?		
40 CFR 63.10030(a), (d)	Submit all notifications required under 63.7(b), (c), 63.8(e), (f)(4) and (6), and 63.9(b) through (h), as applicable.	All notifications will be submitted as required by this section , and according to 63.9(h)(2)(ii). A Notification of Intent to conduct a performance test will be submitted at least 30 days before the test is scheduled to begin as required in 63.10030(d).
40 CFR 63.10030(e)	Notification of Compliance Status.	A Notification of Compliance Status will be submitted including all the information specified in 63.10031(e).
What reports must I submit and when?		
40 CFR 63.10031(a) through (e)	Submit each report in Table 8 by the date specified including: compliance reports, excess emissions reports, deviations.	Reports required by this section will be submitted to the Director and EPA, as required.
40 CFR 63.10031(f)	Results of performane tests and compliance reports will be submitted to WebFIRE or ECMPS, as required.	Reports required by this section will be submitted to the Director and EPA.
40 CFR 63.10031(g)	Compliance reports must include the number of malfunctions and the duration and description of each malfunction.	Reports required by this section will contain the required information.
What records must I keep?		
40 CFR 63.10032(a)	Keep records of all notifications and report submitted to comply with Subpart UUUUU as well as records of tests, fuel analyses or other compliance demonstrations, including performance evaluations.	All the records required by this section will be kept.
40 CFR 63.10032(b)	Maintain CEMS records including those required by 63.10(b)(2)(vi) thorough (xi). Keep records of previous versions of the performance evaluation plan, requests for alternatives to RATA and records of deviations.	All the records required by this section will be kept.
40 CFR 63.10032(c)	Maintain the records required in Table 7, including all monitoring data and calculated averages.	All the records required by this section will be kept.
40 CFR	Maintain records of monthly fuel use and fuel type.	All the records required by this section will be kept.

Citation	Description	Compliance Methodology
63.10032(d)		
40 CFR 63.10032(e)	Keep a copy of the emissions averaging implementation plan (Emissions Averaging Plan), and all calculations.	All the records required by this section will be kept.
40 CFR 63.10032(f), (g), (h), (i)	Maintain records of startups and shutdowns and fuel used during these periods. Document malfunctions, including actions taken to minimize emissions during malfunctions.	All the records required by this section will be kept.
In what form and how long must I keep my records?		
40 CFR 63.10033		Records will be kept for 5 years and at least 2 years of those will be kept on site.

APPENDIX A
NNEPA MATS COMPLIANCE
EXTENSION LETTER



U.S. Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, CA 94105

Navajo Nation Environmental Protection Agency
P.O. Box 339
Window Rock, AZ 86515



JAN 27 2014

Mr. Robert Talbot
Manager
Navajo Generating Station
Salt River Project
P.O. Box 850
Page, Arizona 86040

Re: Mercury and Air Toxics Standards Compliance Extension Request for Navajo Generating Station

Dear Mr. Talbot:

The Navajo Nation Environmental Protection Agency ("NNEPA") and Region IX of the United States Environmental Protection Agency ("USEPA") are in receipt of your letter dated June 28, 2013, as supplemented on December 19, 2013, regarding your request for a one year extension for compliance with 40 C.F.R. Section 63, Subpart UUUUU – National Emission Standards for Hazardous Air Pollutants From Coal- and Oil-Fired Electric Utility Steam Generating Units ("MATS") for Navajo Generating Station ("NGS") Units 1-3. Your December 19, 2013 supplement, which NNEPA received on December 24, 2013, was responsive to NNEPA's finding of incompleteness issued to you on October 3, 2013. Your request, in asking for an additional year to achieve compliance with the MATS, identifies technical difficulties with the control technologies being considered and being tested at NGS, including sorbent polymer limitations and unusual equipment corrosion problems. Your request, as supplemented, proposes the following compliance schedule:

1. Salt River Project ("SRP") will submit to NNEPA a title V permit modification application that incorporates the final mercury control strategy by no later than April 1, 2015;
2. SRP will commence construction to incorporate the mercury control strategy on-site by no later than October 1, 2015; and
3. SRP will complete on-site construction and comply with all mercury provisions of the MATS rule by no later than April 16, 2016.

Pursuant to 40 C.F.R. § 63.6(i), NNEPA and USEPA hereby jointly approve your request for a one year extension to April 16, 2016 to comply with MATS at NGS, including the proposed

Mr. Robert Talbot
Approval of MATS Extension Request
Page 2 of 4

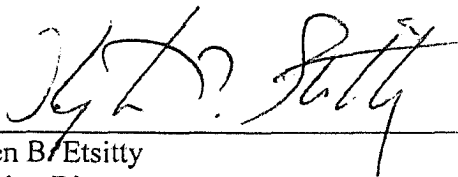
compliance schedule. This approval is contingent upon SRP submitting: (1) a permit modification application to NNEPA by May 30, 2014 to incorporate the MATS compliance extension and the compliance schedule into the title V permit; (2) progress reports to both NNEPA and USEPA that indicate the status of completion of each step of the compliance schedule within 30 days after the completion date for that step; and (3) a final report to both NNEPA and USEPA within 30 days after the final compliance deadline describing the chosen control technology and demonstrating that it is meeting the MATS requirements.

Notwithstanding the compliance extension and the other conditions of approval as described above, nothing in this approval otherwise changes or modifies any requirements of the MATS as it applies to NGS or its operations.

If you have any questions, please contact either Eugenia Quintana, Environmental Department Manager, at NNEPA at 928-871-7800, or Mark Sims, Air & TRI Enforcement Office, USEPA, at 415-972-3965.

Mr. Robert Talbot
Approval of MATS Extension Request
Page 3 of 4

FOR THE NAVAJO NATION ENVIRONMENTAL PROTECTION AGENCY:



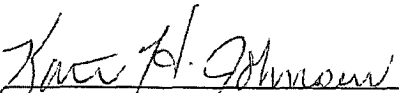
Stephen B. Etsitty
Executive Director
NNEPA

JAN 27 2014

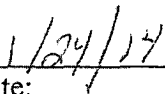
Date:

Mr. Robert Talbot
Approval of MATS Extension Request
Page 4 of 4

FOR THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY:



Kathleen H. Johnson
Director, Enforcement Division
USEPA Region 9



Date:

APPENDIX B
CERTIFICATION OF TRUTH,
ACCURACY AND
COMPLETENESS (CTAC FORM)



APPLICATION FOR PART 71 FEDERAL OPERATING PROGRAM
NAVAJO NATION ENVIRONMENTAL PROTECTION AGENCY
AIR QUALITY CONTROL PROGRAM / OPERATING PERMIT PROGRAM



FORM CTAC – CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS BY RESPONSIBLE OFFICIAL

Instruction: One copy of this form must be completed, signed and sent with each submission of documents (i.e. application forms, updates to applications, reports, or any information required by a Part 71 Permit)

Responsible Official - Identify the responsible official and provide contact information.

Name: (Last) Talbot (First) Robert (Middle) K

Title: Plant Manager

Street or Post Office: PO Box 850, NGS010

City: Page State: Arizona Zip: 86040

Telephone: +1 (928) 645-6217 Ext: Facsimile:

Certification of Truth, accuracy and Completeness – The Responsible Official must sign this Statement.

I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate and complete.

Name (signed): *Robert K. Talbot*

Name (Print or Typed) Robert K. Talbot

Date: 1/15/15